

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

August 11, 2023

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Pursuant to Your Honor's Individual Practices in Civil Cases (Rev. June 28, 2021), III.D., the Plaintiffs' Executive Committees and counsel for the *Ashton* plaintiffs file this motion for oral argument on "Defendant Kingdom Of Saudi Arabia's Motion To Exclude Expert Testimony" (ECF No. 9088) and "Plaintiffs' Daubert Motion To Exclude And/Or Limit Proposed Testimony Of Saudi Arabia's Proposed Experts, Marc Sageman, David Henry Rundell, And Douglas M. Moss" (ECF No. 9091).

Briefing on both of these motions was completed on Friday, August 4, 2023. In accordance with your Emergency Individual Rules and Practices In Light of Covid-19, paper courtesy copies will not be delivered to the Court.

Plaintiffs believe that oral argument of the motions would be of assistance to the Court, as well as the parties, since the motion involves important and unique issues of law and fact, and the record is substantial and complex. This oral argument request is separate from, and in addition to, Plaintiffs' requests that the Court hold an evidentiary hearing as to the jurisdictional inquiry and a *Daubert* hearing as to any of Saudi Arabia's challenges to Plaintiffs' experts that the Court may be inclined to entertain.

Defendants the Kingdom of Saudi Arabia and Dallah Avco oppose this request, and Saudi Arabia has indicated its intent to file a response.

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Respectfully submitted,

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cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF